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From: Diane E Phillips
Sent: Wed 6/10/2015 8:35:17 PM
Subject: Further study needed Re: Villages at Vigneto

Vigneto would include 27,760 new homes, commercial developments, golf courses, parks, vineyards, orchards, resorts, and an extensive road and utility network. Vigneto would potentially attract up to 70,000 new residents. This population explosion would dramatically impact the quality of life of the town of Benson, which currently has only 5,100 residents. and ALL of Arizona

The Clean Water Act Section 404 Permit issued to Whetstone Ranch by the Army Corps of Engineers in 2006 (Permit #2003-00826-SDM) should be re-evaluated for compliance and re-opened to consider changed circumstances and new scientific information that has become available in the past decade. The Villages at Vigneto is a new and a different development proposal than Whetstone Ranch. Whetstone Ranch proposed to build up to 20,000 new housing units on 8,000 acres, while the Villages at Vigneto proposes to build 27,760 housing units on 12,324 acres. Increased impacts to jurisdictional waters from this new proposal will be significantly different and should be re-evaluated.

The Villages at Vigneto poses a potential threat to an EPA-designated Aquatic Resource of National Importance (ARNI), two Global Important Bird Areas on the San Pedro River, the BLM-managed San Pedro Riparian National Conservation Area, the St. David Cienega, numerous mitigation properties located downstream from Vigneto astride the San Pedro River, and the world-class wet cave system at Kartchner Caverns State Park. The sustainability of these vital conservation areas and tourist destinations rely upon having sufficient water quantity and quality. The effects of Vigneto's water use on the San Pedro River could occur many miles away from where water is being pumped, putting our communities, critical wildlife habitats and significant conservation investments at risk.

In 2004 the Environmental Protection Agency (EPA) officially objected to the ACE's issuance of the 404 permit, ". . . because the authorization may result in substantial and unacceptable impacts to aquatic resources of national importance." This objection was ignored and must be resolved.

The USFWS has yet to be formally consulted by El Dorado, or the ACE regarding the potential impacts of the development to threatened and endangered species and migratory birds. Impacts to listed species such as the threatened Western Yellow-billed Cuckoo and Mexican spotted owl, and the endangered jaguar and ocelot must be analyzed and adequately mitigated for.

Wildlife dispersal linkages and habitat connectivity were not adequately considered in the analysis for the 2006 Whetstone Ranch Section 404 Permit. The southern half of Vigneto is located in Arizona Wildlife Linkage Zone #97, identified in the Arizona Department of Transportation (ADOT) and Arizona Game and Fish Department's (AzGFD) 2006 Arizona Wildlife Linkages Assessment.

Part three of the three-part hydrologic study by the USGS that was planned to model water movement along the San Pedro River basin should be funded, completed and fully considered before the Vigneto development is permitted to proceed. Part two of the study, which describes the Middle San Pedro Watershed, was recently released and should be fully considered (click here to read the study by Cordova et al. 2015).

Arizona is now in year 16 of a state declared drought emergency (PCA 99006). Water is our most valuable resource in the desert, especially during times of drought. Approving this large use of limited water resources without sufficient analysis could greatly jeopardize the future availability of water to communities along the San Pedro River, including Benson itself.

The amount of water Vigneto would pump from the shallow aquifer is estimated to be approximately 10,000 acre-feet of water per year. By comparison, in 2013 the City of Benson only pumped 833 acre-feet of water. The combined impacts of dramatically increased ground water pumping, ongoing drought, and predicted climate change-induced megadroughts should be considered carefully by the ACE, EPA, USFWS and the Benson City Council